

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

TIMOTHY MOORE	)	CIVIL ACTION NO.: 2:16-cv-02987-DCN
	)	
Plaintiff,	)	
	)	
-versus-	)	PLAINTIFF'S RESPONSES TO
	)	RULE 26.01 COURT INTERROGATORIES
HOOD INDUSTRIES, INC.	)	
	)	
Defendant.	)	
	)	

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(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Response: Luper Neidenthal & Logan (Consumers Choice Health Plans)  
50 W. Broad Street  
Columbus, OH 43215-3374  
PH (614) 221-7663

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Response: Plaintiff is entitled to a trial by a jury pursuant to the Seventh Amendment of the U.S. Constitution.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Response: Plaintiff is not a publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

Response: The claim was filed in the Charleston Division because it arises out of an accident that occurred in Charleston County, South Carolina, between a resident of Berkeley County, South Carolina, and a foreign corporation.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any reason would entail substantial duplication of labor if heard by different judges.

Response: This action is not related in whole or in part to any other matter filed in this district.

Dennis J. Rhoad, Esquire  
Federal ID# 5299  
123 West Main Street  
Moncks Corner, SC 29461  
PH (843) 482-8877  
FX (843) 482-2852

Sally H. Rhoad, Esquire  
Federal ID# 4948  
123 West Main Street  
Moncks Corner, SC 29461  
PH (843) 482-8877  
FX (843) 482-2852

August 31, 2016

S/Dennis J. Rhoad

S/Sally H. Rhoad  
Attorneys for Plaintiff